

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

STEVEN SEGAL, NICK HAMMER, ROBIN
HOUGDAHL, and TODD TERRY, on behalf of
themselves and all other similarly situated

Plaintiffs,

v.

RAYMOND BITAR; NELSON BURTNICK;
FULL TILT POKER, LTD.; TILTWARE, LLC;
VANTAGE, LTD; FILCO, LTD.; KOLYMA
CORP. A.V.V.; POCKET KINGS LTD.;
POCKET KINGS CONSULTING LTD.;
RANSTON LTD.; MAIL MEDIA LTD.;
HOWARD LEDERER; PHILLIP IVEY JR.;
CHRISTOPHER FERGUSON; JOHNSON
JUANDA; JENNIFER HARMAN-TRANIELLO;
PHILLIP GORDON; ERICK LINDGREN;
ERIK SEIDEL; ANDREW BLOCH; MIKE
MATUSOW; GUS HANSON; ALLEN
CUNNINGHAM; PATRICK ANTONIUS and
JOHN DOES 1-100

Defendant.

Civil Action No.: 11-CV-4521 (LBS)

DEFENDANTS' NOTICE OF MOTION TO DISMISS PLAINTIFFS' COMPLAINT

PLEASE TAKE NOTICE that Defendants, TILTWARE, LLC; VANTAGE, LTD.;
FILCO, LTD.; POCKET KINGS LTD.; POCKET KINGS CONSULTING LTD.; HOWARD
LEDERER; CHRISTOPHER FERGUSON; JENNIFER HARMAN-TRANIELLO, ERICK
LINDGREN; ERICK SEIDEL; ANDREW BLOCH; MIKE MATUSOW; and ALLEN
CUNNINGHAM, respectfully submit their Motion to Dismiss Plaintiffs' Complaint.

Specifically, Defendants move to dismiss Plaintiffs' Complaint in its entirety pursuant to Federal
Rule of Civil Procedure 12(b)(2) for lack of personal jurisdiction and Rule 12(b)(6) for failure to
state a claim upon which relief can be granted under the Racketeering Influenced and Corrupt

Organizations Act (“RICO”), 18 U.S.C. § 1961, *et seq.*, and for failure to state a conversion claim.

The grounds for Defendants’ Motion to Dismiss Plaintiffs’ Complaint are more fully set forth in the accompanying Memorandum of Law filed contemporaneously herewith.

Dated: August 19, 2011

Respectfully submitted,

/s/ A. Jeff Ifrah

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Attorneys for Defendants,

Tiltware, LLC; Vantage, Ltd.; Filco, Ltd.;

Pocket Kings Ltd.; Pocket Kings Consulting Ltd.;

Howard Lederer; Chris Ferguson; Jennifer

Harman-Traniello; Erick Lindgren; Erik Seidel;

Andrew Bloch; Mike Matusow; and

Allen Cunningham

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of August, 2011, a copy of the foregoing Defendants' Notice of Motion of Dismiss Plaintiffs' Complaint, Memorandum of Law in support thereof, and Proposed Order were sent via the ECF filing system and via email to:

Thomas H. Burt
Beth Landes
Gregory Nespole
Lawrence Kolker
WOLF HALDENSTEIN ADLER FREEMAN & HERZ LLP
270 Madison Avenue
New York, New York 10016

/s/ A. Jeff Ifrah

A. Jeff Ifrah